

EXHIBIT “B”

In The Matter Of:

Cohee v.

Danberg, et al.,

Daniel B. Cohee

October 11, 2017

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|-----------------------|---|------------------|
| DANIEL B. COHEE, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Civil Action No. |
| v. |) | 13-1243-RGA |
| |) | |
| CARL DANBERG, et al., |) | |
| |) | |
| Defendant. |) | |

Deposition of DANIEL B. COHEE taken
pursuant to notice at the Delaware Department
of Justice, Carvel State Building, 6th Floor,
Wilmington, Delaware, beginning at 1:05 p.m.
on Wednesday, October 11, 2017, before Kurt
A. Fetzer, Registered Diplomate Reporter and
Notary Public.

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1 Q. When you were housed in the SHU,
2 how often would someone come by to perform
3 what you referred to as cell-side
4 counseling?

5 A. Basically twice a week.

6 Q. I want to talk a little bit about
7 your relationship with your cellmate,
8 Mr. Purnell Stroman.

9 Do you recall when you first
10 began to be housed with him?

11 A. I remember I had a cell -- I just
12 moved to the MU and I had a cellie named
13 Jamal Daniels for a month or so. And then
14 he left and I was in there maybe a week by
15 myself. And then -- I'm not sure of the
16 exact date. Maybe a month before the
17 incident. He was moved into my cell
18 directly from the SHU.

19 Q. How was your relationship with him
20 in the beginning?

21 A. He was quiet at the beginning, but
22 he just had a lot of personality disorders
23 I'd say. He paced a lot, talked to himself
24 out loud a lot, stayed up all night.



1 Basically he had a lot of animosity.

2 I guess -- I didn't know what
3 he was in for, how much time he had. I
4 only had 11 months left on my sentence and
5 I was just trying to go home. So I would
6 try to sleep my days away a lot and read
7 and write.

8 Yeah, it wasn't good basically.
9 He's just...

10 Q. You said Mr. Purnell had --

11 A. He was miserable. He was just --
12 sorry.

13 Q. You said Mr. Purnell had a lot of
14 animosity?

15 A. Yeah. He just seemed angry all the
16 time.

17 Q. How would this anger be exhibited
18 to you?

19 A. Well, one night I asked him -- he
20 was pacing around in the cell talking to
21 himself, just rambling on about somebody I
22 guess he hurt or whatever.

23 And I just stayed dude, I'm
24 trying to sleep. Do you mind if I sleep?



1 And he was like I'll kill you
2 if you sleep. And it was just pitch black
3 in the cell. They turn the lights off at
4 11:00. It was probably about 12:30 at
5 night. And he just leaned his one foot
6 against the wall and like looked at me.
7 And all I really seen was his eyes in the
8 dark with the light from the outside tower
9 coming through our cell.

10 And that's when I knew I had to
11 get out of there.

12 Q. Do you recall when that incident
13 occurred?

14 A. It was the day before I spoke to
15 sergeant or CO Russell. I'm not sure of
16 the exact date. I actually had the date
17 confused. I thought it was the 24th I was
18 attacked as it says in the complaint and
19 everything. I was attacked on the 23rd.

20 But it was approximately the
21 18th, 17th, something like that of February
22 2012.

23 Q. So the night that it appears that
24 Mr. Purnell threatened you, at what point



1 did you tell an officer or make that threat
2 known?

3 A. The next day.

4 Q. To whom did --

5 A. I didn't say what he said to me. I
6 was still in the cell with Stroman. He had
7 his headphones on on the top bunk. And I
8 know it was like the CO's come by and do a
9 segregation round every 30 minutes to do a
10 visual cell check inspection.

11 I just tapped on the window and
12 I asked CO Russell if I could be moved to
13 another cell; I'm having problems with my
14 cellmate. And he said I don't have the
15 authority; you got to ask Sergeant Jones;
16 he's the lead worker.

17 He was just a regular
18 correctional officer, so I would have to
19 ask his lead worker.

20 Q. What did you do after you spoke to
21 Mr. Russell?

22 A. After he walked away, I guess
23 Stroman heard me. So he pulled his
24 headphones down and was yo, what are you



Daniel B. Cohee

37

1 trying to do, get moved?

2 I said no; I was just talking
3 about when I go to the CREST. And I tried
4 to play it off and he knew basically.

5 Later that night he was crying,
6 staring in the mirror and he was talking
7 about killing hisself. So I told him you
8 don't want to do that. I got up and I
9 hugged him. He had a Bible on the side of
10 his bunk. I said just read your Bible,
11 man; you'll be all right; sorrows come and
12 go.

13 He's like I could just cut my
14 throat, it will take a second, I'm going to
15 be here for life.

16 That's when I started knowing
17 he had life. He started crying. You know,
18 then he started laughing when I handed him
19 the Bible and I hugged him. I knew I had
20 to get out of there.

21 I talked to him that next
22 morning. I asked him do you think you can
23 go to Sergeant Jones and tell him that you
24 want to be in a cell by yourself and get me



1 moved?

2 And he's like I guess. That's
3 with what he did.

4 So when we went to recreation,
5 Stroman went to Sergeant Jones right there
6 by the slider where everybody goes out and
7 plays basketball. And I didn't hear
8 exactly what he said to Sergeant Jones, but
9 he looked at me and he said no, he's not
10 going to move.

11 After that Stroman really
12 started -- inmates started saying things to
13 Stroman about him going to staff. They
14 knew there was probably a problem in our
15 cell and they started instigating him.

16 That was probably a dumb idea
17 that I made him go ask. I should have did
18 it myself.

19 Basically, he just started
20 getting real, you know, agitated with me,
21 argumentative with me. I tried not to
22 argue with him. And when I went to chow
23 the day before the incident, the day of the
24 incident, and I asked Sergeant Jones



1 myself, he basically just cut me short in
2 the middle of the conversation. I told him
3 my cellie needs to go to the SNU, which is
4 the special needs unit for mentally ill
5 inmates because he talked to hisself. He
6 was just really out there, you know. He
7 wasn't on his medications is what he told
8 me one time because I asked him, I said
9 dude, do you take meds or anything? He
10 said yeah, I do but they ain't renewed
11 them.

12 I don't know the exact words,
13 you know, what was said in our conversation
14 it's so long ago.

15 But basically I know I just had
16 to get out of there. Once he said he was
17 going to kill hisself and then, you know, I
18 went to staff and I asked Sergeant Jones.
19 I know that I went to him and I said my
20 cellie has been threatening me. Do you
21 think you can move me to another cell?

22 He said no, I don't do that; I
23 don't move nobody; the only place I move
24 people is to the hole; so if you and your



1 having problems, you-all work it out or
2 fight and I'll send both you-all to the
3 hole, but no, I don't do that.

4 As I walked toward the slider
5 that goes to the building 23 from 24, other
6 inmates were surrounding Stroman saying
7 something like what are you and the white
8 boy having problems, he got you sleeping
9 under the bunk, da-da-da. Basically, you
10 know, they knew that we were trying to get
11 moved so they figured -- you know.

12 After that, he leaned against
13 the wall, he looked at me and he was like
14 biting his lip, angry. We go back to the
15 cell. And my neighbor next door slid the
16 newspaper over and I was reading the
17 newspaper. And I made a comment about a
18 rapist in the newspaper just because that's
19 how I personally feel. I didn't mean to
20 offend him. I didn't know what he was in
21 for, what's going on. I just was trying to
22 change the subject.

23 He was basically saying -- like
24 everybody was laughing at him. I wasn't



1 laughing at him, even though in the summary
2 judgment that's not true. I was just
3 trying to laugh it off when everybody was
4 coming at him because I knew the truth. I
5 was the one trying to get moved. He's not
6 trying to get moved. I knew that we
7 already kind of tried to agree to move, so
8 it was behind the scenes of other inmates
9 in there instigating. Do you know what I
10 mean? Does that make sense?

11 In the summary judgment --

12 MR. MURPHY: Hold on. Let's
13 wait for the next question.

14 Q. So after you spoke to I believe
15 Sergeant Jones, how long was it before the
16 altercation with Mr. Stroman occurred?

17 A. Not even ten minutes. As soon as
18 we got locked in the cell, about two
19 minutes or so.

20 Q. So you said two minutes after you
21 were locked into the cell?

22 A. Approximately, yeah.

23 Q. I want to go back to the night when
24 he threatened you, actually when he



1 slip to the CO and had them shake him down
2 and send him to the hole for contraband. I
3 would have got him out of the cell.

4 Q. Do you recall whether or not your
5 cell was searched for contraband in the
6 days leading up to the incident?

7 A. I'm not sure. They do random
8 shakedowns a lot.

9 Q. Do you recall if your cell was ever
10 subject to a shakedown while Mr. Stroman
11 was your cellmate?

12 A. I believe so. I'm not sure it was
13 so long ago.

14 Q. I don't mean to have you sort of
15 relive the incident. I know it was pretty
16 traumatic.

17 A. Yeah.

18 Q. But after you're reading this
19 paper, you said something to him, I
20 believe. And can you tell me about how the
21 actual altercation came about and how long
22 it lasted, the details?

23 A. Can I use cuss words and stuff?
24 What he said was really hideous. Like he



1 said some things that I didn't know about
2 the victim's family or, you know, if this
3 is publicized or how it works.

4 But basically I said something
5 about, I said something about the rapist in
6 the newspaper. I said they got a rapist in
7 the newspaper.

8 MR. MURPHY: Slow down just a
9 little bit.

10 A. I said you got to be a clown to
11 have to rape a girl in this world with all
12 of the women out there, what a loser or
13 something like that.

14 He stood up, went to the
15 window. He was on the top bunk. His legs
16 were hanging down. He hopped down, went to
17 the window. I guess he was seeing if staff
18 was out there. I didn't know what he was
19 doing.

20 I stood up to make coffee in my
21 tumbler cup. He spun around and he said
22 you think that's funny, man? He said you
23 think that shit is funny, dog?

24 I said what?



1 He said I'm in here for life;
2 I'm here in for rape and murder; I got
3 life, no parole; I cut the girl's throat
4 and I fucked her dead body.

5 And he hit me with the razor
6 across the right side of my face and I
7 punched him. And I put him in a headlock
8 as fast as I could and I hit my nose on the
9 desk because there's not much room. And he
10 cut me on this (indicating) side as he was
11 swinging the blade, cut me on my forearm
12 and my face and he tried to cut my throat.

13 And as I had him in a headlock,
14 he went for my neck here (indicating) where
15 the cut is through my hand which would have
16 been my jugular vein. And I yanked him
17 towards the door, started kicking the door
18 as hard as I could backwards as I held him
19 in a headlock as he was squirming trying to
20 get out and swinging the blade at me.

21 And I just basically held onto
22 him and squeezed him as much as I could and
23 didn't let him out of the headlock.

24 Q. And how long were you restraining



1 on me.

2 Q. Okay. And what happened as the
3 officers are approaching the tier? What
4 happened right after that?

5 A. When I was -- all right. After
6 that? Basically CO Russell said are you
7 shitting me? He seen I guess all the blood
8 and everything. I'm standing by the sink.
9 I wrapped my shirt around my hand that I
10 found on the floor.

11 He just popped -- he said code
12 8, popped the cell, said back up to the
13 door. I backed up and he handcuffed me.
14 They came in, got Stroman as they led me
15 out to the upstairs shower, locked me in
16 the shower. They said do not wash the
17 blood off; we're going to need it for
18 evidence and pictures.

19 And then they left and got him,
20 brought him down to the interview room.
21 And I think they were searching the cell
22 and searching him for the weapon. I
23 remember I passed out in the shower after
24 like ten, fifteen minutes waiting. I



Daniel B. Cohee

50

1 started feeling real woozy.

2 Other inmates were yelling out
3 the doors what happened? Cohee, what
4 happened? Because they all seen me pass by
5 the cell covered in blood. They basically
6 were just telling me keep my mouth shut,
7 don't snitch on him, blah, blah, blah.

8 I just remember I fell into the
9 shower and I fell down. I remember CO
10 Russell or somebody said oh, shit, he just
11 fell in the shower. They called a code 4
12 to hurry the medical staff.

13 After that, about another five
14 minutes or so, maybe ten minutes, then I
15 was led out to the nurses station to wait
16 there until about 1:00 o'clock until the
17 doctors came. And then they just wiped my
18 wounds and Lieutenant Lisa Glick, a
19 blond-haired woman, came in and said she
20 needed to take photographs of the injuries.
21 And basically, you know, they couldn't do
22 much for me. They just basically took
23 pictures of my injuries.

24 And when Dr. Desrosiers got



1 there, she said that my face looked like it
2 just had scratches, superficial scratches
3 and it probably doesn't need stitches and
4 my lip was cut, probably doesn't need
5 stitches. She said my hand wound was
6 pretty severe and might need stitches,
7 which was obvious, my neck and my forearm,
8 my nose from hitting the desk, basically
9 just looked at everything.

10 I was starting to feel real
11 woozy. Like I said, everybody was
12 surrounding me like vultures basically
13 trying to get a look at the injuries or
14 trying to see what happened. I was
15 surrounded by a whole bunch of people that
16 didn't really know what they were doing,
17 you know.

18 One of the nurses, Claire,
19 grabbed my arm. They said we're going to
20 take you out of the cuffs because it was
21 making me -- you know, I was squirting
22 blood everywhere. The injury was so wide
23 that every time -- my finger was like
24 permanently stuck like this (indicating)



1 because the tendon was nicked.

2 So every time I would move my
3 hand, it would squirt blood across the
4 room, like projecting. They were like oh,
5 cool. Some of the CO's thought it was
6 cool. Me, it made me feel sick. I felt
7 like I was going to faint, started sweating
8 real bad, having hot flashes and I remember
9 I blacked out and fell.

10 And I remember another nurse,
11 Dee, opened the ammonia capsule under my
12 nose and said you're going to be all right,
13 baby; you lost a lot of blood.

14 I remember I came to. I stood
15 back up and the nurse tried to grab my arm
16 and hold it down again. And I know that
17 any layman person or anybody just from my
18 mom and growing up that if you get any type
19 of injury you always hold it above your
20 head to stop the bleeding above your heart.
21 Do you know what I mean?

22 She was trying to hold it down
23 so I snatched my hand from her. And then
24 they all the CO's grabbed me and told me to



1 there by myself.

2 Q. You said when you fell down an
3 officer noticed. How were they able to
4 notice that no one was there?

5 A. The interview room, it's on the
6 tier with us. It's actually like where
7 they would keep the mop and bucket and all
8 that stuff for inmates to clean, whoever
9 the main trustee inmate is or whatever.
10 It's right there on the same tier so the
11 door is open. They can just look up at me
12 and I guess they heard me fall, I guess. I
13 don't know how they noticed.

14 Q. Do you know what a code 8 is?

15 A. Yes. It's a fight, I guess.

16 Q. Are you familiar with the term code
17 4?

18 A. Yes.

19 Q. What's a code 4?

20 A. It's like a medical, if somebody
21 passes out or needs medical attention.

22 But I know whenever a code 8 is
23 called, a code 4 is automatically called
24 because of a physical injury. They go hand



Daniel B. Cohee

112

1 Q. I think your testimony to my
2 understanding of the timeline was you sat
3 in the shower for about ten minutes until
4 someone from medical came?

5 MR. MURPHY: Objection.

6 A. No. It might have been twenty
7 minutes.

8 Q. How long was it?

9 A. About fifteen, twenty minutes or
10 so. That's just me from looking at the
11 logbook records of the different times they
12 documented when staff came on the tier,
13 medical arrived.

14 To me it felt like a half hour,
15 but according to the documents it was
16 twenty minutes.

17 Q. Okay. And the medical was not
18 actually housed in the block that you were,
19 cell block you were in, correct?

20 A. There is nurses there in the
21 nurses' station but they weren't there for
22 some reason.

23 Q. So they presumably had to come from
24 some other location?



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1 A. Yes.

2 Q. And you don't know where they were
3 located --

4 A. No.

5 Q. -- to come see you?

6 A. No.

7 Q. From the shower the nurses looked
8 at you and we heard the testimony about the
9 blood and all that. You were then
10 transported into the nurses' station on the
11 tier?

12 A. The nurses never came to the
13 shower. When I fell, the CO's ran upstairs
14 and pulled me out and then helped me down
15 the steps and took me to the nurses'
16 station. Then I waited there for the
17 nurses to come about another ten minutes or
18 so or however long it was, 1:00 o'clock.

19 Q. When they came to see you, the
20 nurses started to put I think you said
21 gauze and things on your injuries, correct?

22 A. Yeah. It just basically was just
23 looking at my injuries. First they were
24 trying to stop the bleeding, you know,



1 But my statement is would you
2 agree it's possible that medical wasn't
3 called for fifteen or twenty minutes after
4 you were put in the nurses' station?

5 A. No, I don't think so. They
6 escorted me there. They wouldn't have
7 escorted me to the nurses' station without
8 the nurses being aware I'm coming there.

9 Do you know what I mean?

10 Q. Well, that's your assumption.

11 I'm saying do you have any
12 documents that say when the nurses were
13 actually notified?

14 A. Just the logbook records.

15 Q. And that shows when they actually
16 were on the tier?

17 A. When they showed up, yes. Not when
18 they're notified that I know of. Just a
19 code 8 pretty much at 12:31 is when they
20 were all notified, I guess because it's a
21 big thing that goes over all of the
22 walkie-talkies. The whole prison is
23 notified that there's an incident to
24 respond to.



Daniel B. Cohee

120

1 Q. Has anybody told you that the
2 nurses purposely responded late to your
3 injury?

4 A. No.

5 Q. You have no evidence to suggest
6 that they purposely responded late?

7 A. I don't think they did it on
8 purpose. I just know they took forever to
9 get to me. I was bleeding.

10 Q. The second thing you said that they
11 did wrong is they didn't stop the bleeding.
12 In particular, the one nurse dropped your
13 hand which you believe from your training
14 from your mother as a little child is the
15 improper thing to do. Is that correct?

16 A. Yeah. Well, them having me
17 handcuffed too behind my back all that time
18 bleeding was not good either. Do you know
19 what I mean? But them grabbing my hand and
20 she applied pressure with some type of
21 towel or cloth and blood was gushing and
22 they were all "ooohh," you know, noises
23 were being made. It made me woozy and I
24 passed out.



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Daniel B. Cohee

127

1 any of Correct Care Solutions' medical
2 policies with regard to treating an inmate
3 who has injuries such as yourself?

4 A. No.

5 Q. The answer is no?

6 A. No.

7 Q. Are you familiar with the prison
8 medical policies for treating an inmate
9 with the injuries that you suffered?

10 A. No.

11 Q. So as you sit here today, you're
12 not aware of any policies or procedures
13 that were violated by any medical staff
14 member?

15 A. Mm-mm.

16 Q. No?

17 A. No.

18 I just remember what gave me,
19 you know, an idea why somebody was in the
20 wrong was basically from me waiting so long
21 to finally wait for an ambulance and I was
22 handcuffed to a chair, still bleeding and
23 holding the things to myself. I'm still
24 cuffed, shackled and cuffed to the chair in



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1 building 24 classroom. I had to hold the
2 bandages and stuff to myself. Everybody
3 left except two correctional officers were
4 there to watch me and just wait for the
5 ambulance.

6 And when the ambulance arrived,
7 they asked why did it take -- they said
8 Jesus Christ, why did it take so long to
9 call an ambulance?

10 Q. And so based on the statement of
11 the ambulance driver is what caused you to
12 think that the medical staff had done
13 something incorrect?

14 A. Yes.

15 Q. You testified early on in your
16 testimony that you filed a lot of
17 grievances.

18 Are you familiar with the
19 medical grievance process?

20 A. Yes.

21 Q. That's different than the prison
22 grievance process, correct?

23 A. Yes.

24 Q. So if you want to grieve about a



Daniel B. Cohee

130

1 the treatment that you received on your
2 face. Is that true?

3 A. No. Yes.

4 Q. No, you never did?

5 A. No.

6 Q. So prior to filing this lawsuit,
7 you never filed a medical grievance?

8 A. Yeah. Because it was too late
9 after the fact. Basically when I was in
10 the infirmary and I asked the staff for the
11 grievance, the only grievance they had was
12 a regular grievance. So I grieved the
13 staff.

14 They didn't have a medical
15 grievance. I didn't even get the regular
16 grievance from the office. I got it from
17 an inmate that works in the infirmary. He
18 said I got you one. He went and got me
19 one.

20 Q. So you're saying you did grieve
21 what the medical staff did?

22 A. No. I never got a medical
23 grievance. They didn't have any to give
24 me.



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Daniel B. Cohee

131

1 Q. You just testified you got a
2 regular grievance though.

3 A. Yes.

4 Q. So you filled out a regular
5 grievance form saying what the medical
6 staff did was incorrect?

7 A. No. I just went and said what
8 Sergeant Jones and Russell did basically
9 and how they didn't do phone punches.

10 MR. WILCOX: Can we mark this
11 as Cohee No. 2?

12 A. I didn't have a grievance to file a
13 medical grievance.

14 Q. Give him a break so he can mark
15 that.

16 (Cohee Deposition Exhibit No. 2
17 was marked for identification.)

18 BY MR. WILCOX:

19 Q. Mr. Cohee, I've handed you a
20 document marked as Cohee 2. It is dated
21 March the 2nd, 2012. Is that correct?

22 A. Yes.

23 Q. And is this a document that you
24 filled out?



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Daniel B. Cohee

132

1 A. Yes.

2 Q. In fact, at the bottom under
3 Grievant's Signature is that your
4 signature?

5 A. Yes.

6 Q. Is this the grievance that you
7 testified to that you filled out in the
8 infirmary for the incident that happened on
9 February 24, 2012?

10 A. Yes.

11 MR. MURPHY: Objection to the
12 form.

13 Q. Does this document reference any
14 treatment of the medical treatment you were
15 given?

16 A. No. Because it's not a medical
17 grievance.

18 Q. And there are no other grievance
19 forms that you filled out other than Cohee
20 2 for this incident?

21 A. No, sir.

22 I was actually told not to
23 utilize my hand for ten days.

24 MR. MURPHY: Wait for a



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Daniel B. Cohee

150

1 that he couldn't get it?

2 A. Yeah.

3 Q. What did he say?

4 A. He told me they never renewed the
5 medication. Because I asked him do you
6 take any meds? You probably should get on
7 some medication because of the way he was
8 getting suicidal and just the way he was
9 acting, you know.

10 And he said he didn't take
11 anything, they didn't give him no new ones
12 basically.

13 Q. You were asked some questions about
14 your injuries and you mentioned PTSD, the
15 scars that you have, physical pain.

16 Has there been any nerve injury
17 or nerve impairment related to the cut that
18 was on your hand?

19 A. Sure, there is.

20 Q. Can you tell me, can you describe
21 for me what sort of impairment that is?

22 A. It's just not the same strength
23 as -- like my pointer finger isn't like it
24 was.



1 form number 584, a regular grievance form.
2 And it's just basically against DOC staff
3 in general rather than medical. That's a
4 different field I guess.

5 Q. After the incident on the 12th when
6 you got back, you left Kent General and you
7 come back to the prison, did you ever
8 request a medical grievance form?

9 A. Yeah. I asked for all of the
10 grievances I could get.

11 Q. Were you ever given a medical
12 grievance form?

13 A. No.

14 MR. MURPHY: Those are all of
15 the questions I have.

16 MR. WILCOX: I have questions.

17 BY MR. WILCOX:

18 Q. You said you estimated the time it
19 took for you to get from the prison after
20 the incident to Kent General was three
21 hours.

22 How did you come up with that
23 number?

24 MR. MURPHY: I'm just going to



1 it would have been sent right back to me as
2 the wrong process.

3 Q. But you didn't make an attempt to
4 do it either, did you?

5 A. No.

6 Q. And did you ever ask any of the
7 doctors while you were in the infirmary to
8 get you a medical grievance form?

9 A. I asked the nurses and the CO's
10 that were with me. And they said they
11 would get me one and then they never did.
12 And the shift changed and it was a whole
13 new staff.

14 And then I asked again and then
15 one of the inmates that were sweeping the
16 floor, he said I gotcha and he went and got
17 me the grievance form. He said that's all
18 they have. The same thing the CO said.

19 Q. But you were in the infirmary for I
20 think you estimated two days after you came
21 back from the hospital?

22 A. It might have been longer.

23 Q. Three days, five days?

24 A. Maybe, yeah. Five, six days.



Daniel B. Cohee

161

1 Q. Hold on.

2 Claims against Correct Care
3 Solutions that you're making that up?

4 A. No.

5 MR. MURPHY: Objection to form.

6 A. Because I already looked at the
7 facts that the doctor orders was don't use
8 my hand for ten days. You're only allowed
9 to have seven days to file a grievance.
10 When I looked back at the facts, I'm like
11 it wouldn't even have mattered.

12 Do you know what I mean? The
13 grievance -- I asked for a grievance.
14 That's all they had. I mean if you was in
15 there right now and you said I need a
16 medical grievance and they said we don't
17 have any, you're screwed. What are you
18 going to do? There's nothing that you can
19 do.

20 Q. So they didn't have a medical
21 grievance forms for five days?

22 A. I don't know how many days it was,
23 but I know any time I asked them I just got
24 tired of asking them, you know.



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162

1 So I just filled out that
2 grievance. My main concern was it gets
3 Sergeant Jones fired or him in trouble for
4 not moving me. That's what -- I was mad.
5 I was frustrated I'm in this situation.
6 Now they want me to press charges and it's
7 going to cause more problems inside this
8 hostile, violent environment in prison.

9 Do you know what I mean?

10 Q. Right.

11 A. I was just trying to heal.

12 Q. Right. So your main purpose in
13 grieving was to --

14 A. So much stuff was going on.

15 Q. -- was to get the sergeant fired,
16 correct?

17 A. Pretty much. Like let him -- yes.

18 Q. Right. It wasn't to grieve about
19 the medical care you got?

20 A. I would have filed a medical
21 grievance and I didn't have any. I just
22 would have said the same thing. They
23 delayed access to the ambulance, made me
24 pass out, general things.



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